The American Council of Engineering Companies of Oklahoma (ACEC Oklahoma) is a 74 member not-for-profit trade association representing engineering firms in Oklahoma.

ACEC Oklahoma members voluntarily join the association and expect, as a benefit of membership, to be provided with prompt, timely information. Fax communication with our member firms, and their some 1500 employees, is a vital element of our communication process.

ACEC Oklahoma strongly opposes the Commission's proposed rules under Proceeding 02-278. The requirements of the Proceeding would put unnecessary restrictions on our communications with our members, as well as require onerious paperwork and recordkeeping.

In our opinion, by joining our organization members are already agreeing to receive communications in any form deemed appropriate by ACEC Oklahoma. Requiring us, and all other volunteer membeship associations, to acquire additional "permission" from members to communicate with them is simply "overkill" by the Commission in its effort to stop unsolicited and unwanted faxes.

The Commission should exempt all IRS Code 501 (C) organizations from the requirements of Proposal 02-278.

Thank you for your time and consideration.

James F. Sullins, CAE President & CEO American Council of Engineering Companies of Oklahoma